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MICHAEL RODAK, JR.

IN THE

Supreme Court of the United States

October Term, 1972

No. 72-1134

DEL JEANNENE JOBE, individually and on behalf of employees of the previously existing Amerada Petroleum Corporation, the employees of the previously existing Hess Oil and Chemical Corporation, and the employees of Amerada Hess Corporation,

Petitioners,

v.

AMERADA PETROLEUM CORPORATION, HESS OIL & CHEMICAL CORPORATION, and AMERADA HESS CORPORATION,

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE TENTH CIRCUIT

RESPONDENTS' BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

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March 14, 1973

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Petitioners,

v.

AMERADA PETROLEUM CORPORATION, *et al.*,
Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE TENTH CIRCUIT

RESPONDENTS' BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

Question Presented

Whether petitioners, former salaried employees of one of two merging corporations whose employment was terminable at will and was in fact terminated following the merger, have standing to sue for damages allegedly resulting from such termination, based on a claim that the merger violated the antitrust laws?

Counter-Statement of the Case

In this action, commenced February 24, 1970, petitioners—three former salaried employees of the Amerada Division of respondent Amerada Hess Corporation—individually and on behalf of a purported class of former

employees sought treble damages and divestiture under Sections 4 and 16 of the Clayton Act based on the claim that the termination of their employment on February 2, 1970, resulted from the merger, alleged to be in violation of Section 1 of the Sherman Act and Section 7 of the Clayton Act, of Hess Oil & Chemical Corporation ("Hess") into Amerada Petroleum Corporation ("Amerada") on June 20, 1969.

At the time of the merger of Hess into Amerada, petitioners were employed as draftsmen in the geophysical department of Amerada in Tulsa (which after the merger became the Amerada Division of respondent Amerada Hess Corporation). None of them had a contract of employment; all were salaried employees terminable at will. (R Vol. I, pp. 21, 30, 41 and 161)*

Contrary to plaintiff's statement [Petitioners' Brief ("Pet. Br.") pp. 11-12], prior to the merger Hess was not an integrated oil company, but was engaged almost exclusively in refining crude oil purchased from others and in marketing refined oil products. In contrast, prior to the merger, the activities of Amerada were limited almost exclusively to exploration for, and production of, crude oil. (R Vol. VI, p. 89; Vol. VII, pp. 64-65)

The record clearly shows that prior to the merger no consideration was given to its possible effect on the employees of either company, nor was it contemplated that the merger would result in the termination of any employees. The organizational review of the Amerada Division, which led to the terminations, early retirements and transfers of certain of the Division's personnel, including petitioners, was not even undertaken until late October 1969, some five months after the merger had been approved by the stockholders of Hess and Amerada, and some four months after the closing of the merger. This review, which was completed in November 1969, related exclusively to the Amerada

* References to "R.." are to the pages of the original record on appeal.

Division and was primarily designed to improve the efficiency of the internal operation of the Division. In the course of the review, it was discovered that there were a considerable number of redundant employees in the Amerada Division, a discovery which led to the recommendation, in early 1970, that certain of the Division's employees be terminated, retired early, or transferred. (R Vol. VI, p. 81; Vol. VII, pp. 11, 24-26; and Vol. VIII, pp. 37-38, 46)

Petitioners' employment was terminated on February 2, 1970, and this suit was instituted that same month.

Petitioners erroneously imply that the motion for summary judgment was granted " . . . on the ground that claimed loss of employment does not constitute injury to business or property." (Pet. Br. pp. 12-13) As the Court of Appeals noted, the District Court's dismissal "was bottomed on the determination that Jobe lacked standing to sue for loss of employment resulting from an alleged illegal merger." (A 35)* In affirming the Court held:

> "Our exhaustive analysis in Reibert[**] clearly indicates employees are not within the area of competition protected by the above-stated acts, and we need not elaborate." (A 35)

Reasons for Denying Certiorari

This case involved nothing more than the application of well-settled rules to a particular set of facts. It was correctly decided in the Courts below.

There is no departure from the decisions of this Court nor any conflict among the Courts of Appeals on the legal issue involved, and this case presents no novel or important federal question for this Court to review.

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*References to "A ....." are to the pages of the appendix to the petition.

** See decision in *Reibert* v. *Atlantic Richfield Co.*, et al., reprinted at A 3-A 14.

ARGUMENT

Under Well-Settled Rules Petitioners Have No Standing to Claim any Relief Under the Antitrust Laws.

A. The Uniform Rule on Standing

For nearly sixty-five years, the federal courts have uniformly held that the right of private parties to sue under the antitrust laws is limited to persons who are engaged in the business in which the alleged antitrust violations have restrained competition and who are "directly" injured by such allegedly illegal restraints because of the lessening of competition occasioned thereby.* It is not enough that the ultimate effects of the activity, filtered through many layers of the economy, allegedly cause some loss. A claimant must show that his claimed injuries were not incidental and indirect but rather that he was possessed of business or property in the line of commerce in which competition is allegedly restrained, and injured by reason of the alleged restraint on competition within that line of commerce.

The "directness" requirement has long been recognized and applied in many cases in all circuits. For example:

First Circuit:

> "The injuries set forth thus seem to fall within the class of indirect and speculative injuries for which plaintiff cannot recover under 15 U.S.C.A. § 15." *Miley* v. *John Hancock Mutual Life Insurance Co.*, 148 F. Supp. 299, 303 (D. Mass.), *aff'd*, 242 F.2d 758 (1st Cir.), *cert. denied*, 355 U.S. 828 (1957). See also *Snow Crest Beverages, Inc.* v. *Recipe Foods, Inc.*, 147 F. Supp. 907, 909 (D. Mass. 1956).

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*Limitations upon private standing to sue were recognized under Section 7 of the Sherman Act (Act of July 2, 1890, Ch. 647, § 7, 26 Stat. 210.), the predecessor of Section 4 of the Clayton Act. *Ames* v. *A.T.&T.*, 166 Fed. 820 (C.C.D. Mass. 1909). Section 4 is substantially identical to that former statutory provision, and the cases decided under Section 7 of the Sherman Act are valid authority on that issue.

Second Circuit:

"Those harmed only incidentally by antitrust violations have no standing to sue for treble damages; only those at whom the violation is directly aimed, or who have been directly harmed may recover." *Productive Inventions, Inc.* v. *Trico Products Corp.*, 224 F.2d 678, 679 (2d Cir. 1955), *cert. denied,* 350 U.S. 936 (1956). *Accord, SCM Corp.* v. *Radio Corp. of America,* 407 F.2d 166, 170-71 (2d Cir.), *cert. denied,* 395 U.S. 943 (1969).

Third Circuit:

"[T]he courts recognize that the Act does not give a right of action to every one who can trace a financial loss, however remote, to a violation of the antitrust laws." *Harrison* v. *Paramount Pictures, Inc.,* 115 F. Supp. 312, 317 (E.D. Pa. 1953), *aff'd,* 211 F.2d 405 (3d Cir.), *cert. denied,* 348 U.S. 828 (1954). *Accord, Melrose Realty Co.* v. *Loew's, Inc.,* 234 F.2d 518 (3d Cir.), *cert. denied,* 352 U.S. 890 (1956).

Fourth Circuit:

"If the damage was merely incidental or consequential, or if the defendants' antitrust acts are so removed from the injury as to be only remotely causative, the plaintiffs have not been injured 'by reason of anything forbidden in the antitrust laws' as contemplated by the Clayton Act." *South Carolina Council of Milk Producers, Inc.* v. *Newton,* 360 F.2d 414, 419 (4th Cir.), *cert. denied,* 385 U.S. 934 (1966).

Sixth Circuit:

"It is well established in the law that a supplier is too remote and too far removed from the direct injury to recover damages resulting from violation of the antitrust laws directed against the supplier's customer." *Volasco Products Co.* v. *Lloyd A. Fry Roofing Co.,* 308 F.2d 383, 395 (6th Cir. 1962), *cert. denied,* 372 U.S. 907 (1963).

Ninth Circuit:

> "[T]he rule is that one who is only *incidentally* injured by a violation of the antitrust laws,—the bystander who was hit but not aimed at,—cannot recover against the violator." *Karseal Corp.* v. *Richfield Oil Corp.*, 221 F.2d 358, 363 (9th Cir. 1955). *Accord, Hoopes* v. *Union Oil Co.*, 374 F.2d 480, 485 (9th Cir. 1967).

Tenth Circuit:

> "[W]e hold that under the authorities the plaintiff here has not alleged a cause of action under the Clayton Act because its position relative to the injuries resulting from the alleged acts of the defendants is too remote.
>
> ". . . [I]ts damage resulting from the acts of defendants would come about 'indirectly,' 'remotely,' or as 'derivative damages.'" *Nationwide Auto Appraiser Service, Inc.* v. *Assoc. of Casualty and Surety Cos.*, 382 F.2d 925, 928-29 (10th Cir. 1967).

See also, *Commonwealth Edison Co.* v. *Allis-Chalmers Mfg. Co.*, 315 F.2d 564, 566-67 (7th Cir.), *cert. denied, sub nom., Illinois* v. *Commonwealth Edison Co.*, 375 U.S. 834 (1963); *Dailey* v. *Quality School Plan, Inc.*, 380 F.2d 484, 487-88 (5th Cir. 1967); *Sanitary Milk Producers* v. *Bergjans Farm Dairy, Inc.*, 368 F.2d 679, 688-89 (8th Cir. 1966).

Standing is accorded only to those directly injured by an antitrust violation and is denied to those whose injury is indirect, secondary, derivative or remote. Unless a potential plaintiff can demonstrate he is within what is termed the "target area" of the violation, he has no standing to sue. *E.g., Fields Productions, Inc.* v. *United Artists Corp.*, 432 F.2d 1010 (2d Cir. 1970), *cert. denied*, 401 U.S. 949 (1971);

Billy Baxter, Inc. v. *Coca-Cola Co.*, 431 F.2d 183, 187 (2d Cir. 1970), *cert. denied*, 401 U.S. 923 (1971); *Productive Inventions, Inc.* v. *Trico Products Corp.*, 224 F.2d 678, 679-80 (2d Cir. 1955), *cert. denied*, 350 U.S. 936 (1956); *Nationwide Auto Appraiser Service, Inc.* v. *Assoc. of Casualty and Surety Cos.*, 382 F.2d 925, 927-29 (10th Cir. 1967); *Karseal Corp.* v. *Richfield Oil Corp.*, 221 F.2d 358, 363 (9th Cir. 1955); *Kirihara* v. *Bendix Corp.*, 306 F. Supp. 72, 89-91 (D. Hawaii 1969).

The "target area" concept, referred to above, is a judicial construction to ensure that the:

> ". . . broad language [of] § 4 of the Clayton Act does not give a private cause of action to a person whose losses result only from an interruption or diminution of profitable relationships with the party directly affected by alleged violations." *Snow Crest Beverages, Inc.* v. *Recipe Foods, Inc.*, 147 F. Supp. 907, 909 (D. Mass. 1956) (Wyzanski, J.)

The term "target area" is used to denominate "that area of the economy which is endangered by a breakdown of competitive conditions in a particular industry." *Conference of Studio Unions* v. *Loew's Inc.*, 193 F.2d 51, 55 (9th Cir. 1951), *cert. denied*, 342 U.S. 919 (1952).

In order to demonstrate standing, a plaintiff must show that the claimed injury suffered is causally connected to the violation alleged. The Courts have construed this to require a demonstration of proximate causality and a showing that there is a connection between the loss of competition and the harm allegedly incurred.

> ". . . this [causal] connection must . . . link a specific form of illegal act to a plantiff engaged in the sort of legitimate activities which the prohibition of this type of violation was clearly intended to protect." *Billy Baxter, Inc.* v. *Coca-Cola Co.*, 431 F.2d at 187.

This Court has repeatedly denied certiorari in cases involving the directness or "target area" requirement. *E.g., Calderone Enterprises Corp.* v. *United Artists Theatre Circuit, Inc.*, 454 F.2d 1292 (2d Cir. 1971), *cert. denied*, 406 U.S. 930 (1972); *Billy Baxter, Inc.* v. *Coca-Cola Co.*, 431 F.2d 183 (2d Cir. 1970), *cert. denied*, 401 U.S. 923 (1971); *SCM Corp.* v. *Radio Corp. of America*, 407 F.2d 166 (2d Cir.), *cert. denied*, 395 U.S. 943 (1969); *South Carolina Council of Milk Producers, Inc.* v. *Newton*, 360 F.2d 414 (4th Cir.), *cert. denied*, 385 U.S. 934 (1966); *Conference of Studio Unions* v. *Loew's Inc.*, 193 F.2d 51, 54 (9th Cir.), *cert. denied*, 342 U.S. 919 (1952).

B. Application of the Standing Rule to This Case

Here it is clear that petitioners are not within the "target area". The prohibition in Section 7 of the Clayton Act of mergers the effect of which "may be substantially to lessen competition, or to tend to create a monopoly" was not designed to protect employment, but rather to prevent the destruction of competition in the industry of which the merging companies are a part. Petitioners' activities are not in the area of the economy allegedly threatened by a restraint on competition, their alleged injury is not a direct result of lessened competition in that line of commerce and, thus, their alleged injury is merely incidental.

The decisions below were thus consistent with the doctrine of standing as uniformly applied by the federal courts.

In *Conference of Studio Unions* v. *Loew's Inc., supra*, a case nearly on "all fours" with this one, the "target area" concept was applied to a claim raised by employees. There, the plaintiff union members who had been discharged by certain major motion picture producers, allegedly as a result of a conspiracy to injure certain independent studios and monopolize the movie production business, brought suit under Section 4. The Court of Appeals for the Ninth

Circuit, in affirming a judgment on the pleadings predicated upon the holding that the plaintiffs lacked standing, observed:

> "Any restraint on commercial competition would occur in the production of motion pictures and we fail to see how appellants [the employees] are in a position to complain about that situation."
>
> • • •
>
> "The damage alleged to have been suffered by appellants [loss of employment] does not flow from any injury to the competitive situation in the motion picture industry . . ." 193 F.2d at 54

This reasoning is wholly applicable to the present case. To paraphrase: any restraint on commercial competition as a result of the allegedly unlawful merger here would occur in the production, refining and marketing of petroleum products, and the damage alleged, loss of employment, does not flow from any injury to the competitive situation in the petroleum industry.

Moreover, it is clear that affording a remedy for this alleged injury does not aid in the effectuation of the purposes of Section 7, to wit: the inhibition of unlawful diminutions of competition in industries by way of mergers. In short, the "target area" of this alleged violation is the petroleum industry, in which plaintiffs have no direct interest. Their alleged injury was at most an indirect and unforeseen consequence of the merger and did not flow from any breakdown of competitive conditions in that industry and, as such, it is incidental, secondary, derivative and remote.

C. Petitioners' Efforts to Avoid the Standing Requirement

Petitioners' contention that salaried employees may sue under Section 4 of the Clayton Act for the kind of injury allegedly suffered here is completely unsupported by the cases cited.

For instance, *Hawaii* v. *Standard Oil Co. of Cal.*, 405 U.S. 251 (1972), (Pet. Br. p. 14), involved the issue of a state's standing to sue under Section 4 of the Clayton Act on behalf of its citizens for injury to the general economy by means of the doctrine of *parens patriae;* the question of the directness of injury was not before the Court.

Petitioners' reliance on *Radovich* v. *National Football League*, 352 U.S. 445 (1957) and *Flood* v. *Kuhn*, 407 U.S. 258 (1972) is also misplaced. The issue of standing was not raised in those cases. In both *Radovich* and *Flood*, the plaintiffs were engaged in the lines of commerce restrained and thus were the very targets of the violations.

In *Perkins* v. *Standard Oil Co.*, 395 U.S. 642 (1969) the plaintiff was not a salaried employee but ". . . one of the largest independent distributors of gasoline and oil in both Washington and Oregon." 395 U.S. at 644. There, Perkins brought an action under the Robinson-Patman Act alleging price discrimination by his supplier. Perkins' standing under that Statute was challenged on the grounds that the price discrimination was filtered through other distributors before it reached the competitive line in which injury was claimed. This Court resolved that issue by application of the indirect purchaser doctrine, unique to the Robinson-Patman Act. In any event, Perkins was engaged in the sale of gasoline, the product which defendant sold at prices claimed to be discriminatory. Hence, his injury did not involve the issue of directness here presented; Perkins was "aimed at" and within the "target area" of the violation.

The same is true of *Vandervelde* v. *Put and Call Brokers & Dealers Ass'n*, 344 F. Supp. 118 (S.D.N.Y. 1972). The plaintiff in that case was not merely a salaried employee but was in fact the sole proprietor of a put and call business which was found to have been injured by reason of a boycott. The defendant in *Vandervelde* was an association of indi-

vidual put and call brokers. The plaintiff was a member of the association who had been suspended for his refusal to adhere to a rule of the association found to be violative of the antitrust laws. The directness of the plaintiff's injury is thus apparent; the plaintiff (and his *alter ego*, the wholly-owned corporation through which he did business) was the target of the violation alleged. The plaintiff was engaged in the line of commerce restrained by the association's illegal rule and directly injured by the association's enforcement of that rule; he was not only in the target area—he was the target.

Not only do petitioners misread the authorities, but they also err in contending that the "directness" required to establish standing is a showing that their injury was a direct result of *the merger*. This is a misconception. In order to have standing, a plaintiff must demonstrate that the alleged injury was a direct and intended result of the *illegality* of the merger. See cases cited at pp. 4-7, *supra*. The lessening of competition must be the "but for" and proximate cause of the injury. In short, unless the injury is causally connected to the violation—*i.e.*, results from the 'lessening of competition'—and is the first and direct impact of the allegedly tortious course of conduct, a plaintiff has no standing to sue.

The question posed by this case is not whether the national pro-competitive policy embodied in the antitrust laws is one of highest dignity or whether the Congress has invested individuals with the power of private attorneys general, but rather what is the limit of that grant of authority. Sociological tracts as to the importance of a free market economy or the value of the "work ethic" are simply beside the point.

CONCLUSION

There are no special or important reasons for this Court to review the decision below, and therefore the petition should be denied.

Respectfully submitted,

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